

MORRISON & FOERSTER LLP
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Larren M. Nashelsky
Brett H. Miller

UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF NEW YORK

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	:
In re:	: Chapter 11
	:
LEHMAN BROTHERS HOLDINGS INC., <u>et al.</u> ,	: Case No. 08-13555 (JMP)
	:
	: Jointly Administered
Debtors.	:
	:
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**FOURTH AMENDED VERIFIED STATEMENT OF MORRISON & FOERSTER LLP
PURSUANT TO FEDERAL RULE OF BANKRUPTCY PROCEDURE 2019**

Pursuant to Rule 2019 of the Federal Rules of Bankruptcy Procedure, Morrison & Foerster LLP (“Morrison”) makes the following disclosure in connection with the chapter 11 cases (the “Cases”) of Lehman Brothers Holdings, Inc., and each of its affiliated debtors who have filed Chapter 11 cases (collectively referred to as the “Debtors” and, collectively with their non-debtor affiliates, “Lehman”):

1. Morrison previously filed a Verified Statement, an Amended Verified Statement, a Second Amended Verified Statement, and a Third Amended Verified Statement on October 17, 2008, December 9, 2008, August 10, 2009, and May 31, 2011 respectively (together, the “Statements”).

2. Morrison, in addition to the entities disclosed in the Statements (listed on Exhibit A hereto), now also represents the entities listed on Exhibit B hereto (together with the Exhibit A entities, the “Entities”), who may hold claims against and/or interests in the Debtors arising out

of applicable agreements, law or equity pursuant to their respective relationships with the Debtors.¹

3. Morrison no longer represents the parties listed on Exhibit C hereto with respect to the Cases.

4. Each of the Entities separately requested that Morrison represent them in connection with the Cases.

5. Morrison is representing each of these clients individually. At the time of the filing of this Fourth Amended Verified Statement, the clients listed on Exhibit A and Exhibit B do not comprise a committee of any kind.

6. Morrison itself currently possesses an unsecured claim against the Debtors in the amount of \$1,017,119.61, which arose as a result of Morrison's representation of certain Lehman entities in connection with the prosecution of a fraud action in Japan (the "Japan Action"). Upon information and belief, Morrison does not currently possess and has not possessed in the past any interests in any Debtor.²

7. Pursuant to the Ordinary Course Professional Affidavit of Craig Celniker, dated December 17, 2008, the Debtors retained Morrison as an ordinary course professional in connection with the Japan Action. Lehman consented to Morrison's continued representation of the Entities in connection with the Debtors' Cases, and each of the Entities also consented to Morrison's representation of Lehman in the Japan Action. Morrison is not aware of any conflict and does not believe that the potential continued representation of the Debtors in connection with the Japan Action gives rise to any conflict of interest with any of the Entities.

¹ Many of the Entities have filed proofs of claim against certain of the Debtors as of the date hereof.

² However, partners, associates and staff of Morrison may, in their individual capacities, hold claims and/or equity interests in the Debtors.

8. Morrison will supplement this Fourth Amended Verified Statement, as applicable, in the event counsel is retained by additional parties in connection with the above-captioned Cases.

Dated: June 30, 2011
New York, New York

Respectfully submitted,

/s/ Darren M. Nashelsky
Darren M. Nashelsky
Brett H. Miller
MORRISON & FOERSTER LLP
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New York, New York 10104
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EXHIBIT A

Lehman Brothers Japan, Inc. (and certain of its subsidiaries and affiliates)
Roppongi Hills Mori Tower, 6-10-1 Roppongi, Minato-ku
Tokyo, 106-6131, Japan

Brookfield Properties One WFC Co., LLC
Three World Financial Center
200 Vesey Street
New York, NY 10281-1021

The Chuo Mitsui Trust and Banking Co., Ltd.
33-1, Shiba 3-chome,
Minato-ku, Tokyo 105-8574, Japan

CB Richard Ellis, Inc.
100 No. Sepulveda Blvd., Suite 1050
El Segundo, CA 90245

PCCP, LLC¹ (and certain of its subsidiaries and affiliates)
12885 Alcosta Boulevard, Suite A
San Ramon, California 94583

Mitsubishi UFJ Morgan Stanley Securities Co., Ltd.²
Marunouchi Bldg. 2-4-1
Marunouchi, Chiyoda-Ku
Tokyo, 100-6317
Japan

Mitsubishi UFJ Securities Holdings Co.³
1-1-3 Otemachi
Chiyoda-ku, Tokyo 100-8138
Japan

Nippon Life Insurance Company
1-6-6. Marunouchi, Chiyoda-Ku
Tokyo 100-8288, Japan

¹ PCCP, LLC was previously listed on the Statements under the name Pacific Coast Capital Partners, LLC.

² Mitsubishi UFJ Morgan Stanley Securities Co., Ltd. was previously listed on the Statements under the name Mitsubishi UFJ Securities Company, Ltd.

³ Mitsubishi UFJ Securities Holdings Co. was previously listed on the Statements under the name Mitsubishi UFJ Securities Company, Ltd.

Municipality Finance, PLC
PO Box 744, Antinkatu 3 C, 5th Floor
FI-00101 Helsinki, Finland

AB Bankas SNORAS
Vivulskio 7
LT-03221
Vilnius, Lithuania

ING Real Estate Finance (USA) LLC
230 Park Avenue, 15th Floor
New York, NY 10169

Fondiaria - SAI S.p.A.
BIM Vita S.p.A.
SASA Vita S.p.A.,
SASA Assicurazioni Riassicurazioni S.p.A.
Milano Assicurazioni S.p.A.,
Popolare Vita S.p.A.,
Banca Sai S.p.A.
Systema Vita S.p.A. (formerly Effe Vita - Compagnia di Assicurazioni sulla Vita S.p.A.)
Novara Vita S.p.A.
c/o Fondiaria – SAI S.p.A.
Piazza della Libertà , 6
50129 Firenze Italy

MediConnect Global, Inc.
10897 South Riverfront Pkwy
Suite 500
South Jordan, Utah 8409

Chinatrust Commercial Bank Co., Ltd.
1F., No.3, Songshou Rd.,
Taipei, Taiwan

Mega International Commercial Bank Co., Ltd.
No. 123, Sec. 2, Jhongsiao E. Road
Taipei, Taiwan

UBS AG
5F. & 13F., No. 7, Song Ren Road
Taipei, Taiwan

Bank SinoPac Co., Ltd.
9-1, Chien Kuo N. Road, Sec. 2,
Taipei, Taiwan

First Commercial Bank
30 Chung King South Road, Sec 1
Taipei, Taiwan

Entie Commercial Bank
2F, 156 Minsheng East Road, Sec. 3
Taipei, Taiwan

Ta Chong Bank, Ltd.
12F, No. 2, Sec. 5, Hing-Yi Road
Taipei, Taiwan

Chinfon Commercial Bank, Ltd.
No. 1 Nanyang Street
Taipei, Taiwan

Bank of Kaohsiung Co., Ltd.
168 Po Ai 2nd Road
Tsoying District
Kaohsiung, Taiwan

Union Bank of Taiwan
3F, No. 109, Min-Sheng E. Rd., Sec. 3
Taipei, Taiwan

Far Eastern International Bank
26,27/F No. 207 Tun Hwa S. Road, Sec 2
Taipei Taiwan

Yuanta Commercial Bank Co. Ltd.
9F., No. 66, Sec 1, Dunhua S. Road
Taipei, Taiwan

Jih Sun International Bank
1F., No. 10, Sec. 1, Chongcing S. Road
Taipei, Taiwan

Taichung Commercial Bank Co., Ltd.
No. 87 Mincyuan Road, West District
Taichung City, Taiwan

Cathay United Bank Company, Ltd.
7 Song-Ren Road
Taipei, Taiwan

Jih Sun Securities Co., Ltd.
3F., No. 111, Sec 2, Nan King E. Road
Taipei, Taiwan

Mega International Commercial Bank Co., Ltd.
Hong Kong Branch (c/o Mega International Commercial Bank Co., Ltd.)
11 F., No. 100, Jilin Rd.
Zhongshan District
Taipei City 104, Taiwan

Taishin International Bank
Taishin Securities Co., Ltd.
12 F., No. 118, Sec. 4, Ren-ai Rd.
Taipei City 106, Taiwan, Republic of China

Taishin International Bank, Hong Kong Branch
Taishin Securities (Hong Kong) Co.
2F., No. 44, Sec. 2
Jhongshan North Road
Jhongshan District
Taipei City 104, Taiwan

HSBC Bank (Taiwan) Limited⁴
13 F., No. 333, Sec. 1, Keelung Road
Sinyi District
Taipei City 110, Taiwan, R.O.C.

Eurosai Finanziaria di Partecipazioni S.r.l.
c/o Fondiaria – SAI S.p.A.
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50129 Firenze Italy

Credem International (Lux) S.A.
10/12, Avenue Pasteur,
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Redfire, Inc.
One Beach Street, Suite 300
San Francisco, California 94133

Davide Campari-Milano S.p.A.
Via Franco Sacchetti 20
20099 Sesto San Giovanni Milan, Italy

⁴ HSBC Bank (Taiwan) Limited was previously listed on the Statements under the name HSBC, Taipei Branch.

EXHIBIT B

CGKL Ventures, LLC
150 California Street, 22nd Floor
San Francisco, CA 94111

Chinatrust Asia Limited
Room 2809, 28th Floor, IFC II
No. 8 Finance Street
Central Hong Kong

EXHIBIT C

Yunata Asset Management Limited
Yunata Asset Management (H.K.) Limited
Suites 2003-4
Li Po Chun Chambers
189 Des Vouex Road
Central, Hong Kong

Overseas-Chinese Banking Corporation Limited
65 Chulia Street
Singapore 049513

Fondo Latinoamericano de Reservas
Avenida 82, No. 12-18, Piso 7
Bogota, Colombia

Citibank, N.A., Taipei Branch
Citibank Taiwan Ltd.
3F, No. 89 Songren Rd.
Xinyi District
Taipei City 110, Taiwan

King's Town Bank
506, Sec 1, Shi-Men Road
Tainan, Taiwan